

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHAUNTA DOVE, on behalf of HERSELF and
all others similarly situated,

Plaintiffs,

-against-

APPLE -METRO, INC., *et al.*,

Defendants.

Index No. 13-CV-01417 (JBW)(RER)

**PLAINTIFF SHAUNTA DOVE'S RESPONSES AND OBJECTIONS
TO DEFENDANTS' FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Plaintiff Shaunta Dove (“Plaintiff”), pursuant to Federal Rules of Civil Procedure (“Fed. R. Civ. P.”) 26 and 33, the Local Civil Rules of the United States District Court for the Eastern District of New York (“Local Rules”), hereby provides her objections and responses to “Defendants’ First Set of Interrogatories upon Plaintiff Shaunta Dove” in accordance with the numbered responses as set forth below. These objections and responses reflect Plaintiff’s current knowledge and the results of her investigation to date. Plaintiff reserves the right to amend or supplement these objections and responses in the future in accordance with Fed. R. Civ. P. 26(e) as may be necessary or appropriate.

OBJECTIONS TO “INSTRUCTIONS AND DEFINITIONS”

Plaintiff objects to the “Instructions” and “Definitions” of Defendants Apple-Metro, Inc., AM NYCF, LLC, 117th Apple, LLC, 42nd Apple, LLC, Airmont Apple, LLC, Astoria Apple, LLC, AT Apple, LLC, Bay Plaza Apple, LLC, Bay Terrace Apple, LLC, Bed-Stuy Apple, LLC, Broadway Apple, LLC, BTM Apple, LLC, Cortlandt Apple, LLC, Cross Country Apple, LLC, Crossroads Apple, LLC, EB Apple, LLC, Expressway Apple, LLC, Flatbush Apple, LLC,

recordings of any kind relating to or referencing the allegations in the Complaint or the facts underlying said allegations.

Response: Plaintiff objects on the grounds that this Document Request is overly broad, unduly burdensome, vague, ambiguous, cumulative, and seeks information that is protected by the attorney-client privilege and/or the work product doctrine. Subject to and without waiving the foregoing and general objections, Plaintiff avers that she will produce all non-privileged, responsive documents in her possession, custody and/or control.

Document Request No. 157: All documents not produced in response to the foregoing requests that concern any of the allegations or claims in the Complaint.

Response: Plaintiff objects on the grounds that this Document Request is overly broad, unduly burdensome, vague, ambiguous, cumulative, and seeks information that is protected by the attorney-client privilege and/or the work product doctrine. Subject to and without waiving the foregoing and general objections, Plaintiff avers that she will produce all non-privileged, responsive documents in her possession, custody and/or control.

Dated: October 4, 2013
Great Neck, New York

Respectfully submitted,

By: /s/ Daniela Nanau
Daniela E. Nanau, Esq.

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served a copy of the foregoing by electronic mail and First Class Mail on counsel for Defendants APPLE METRO, INC.; AM NYCF, LLC; 42ND APPLE LLC; 117th Apple, LLC; Airmont Apple, LLC; Astoria apple, llc; AT Apple, LLC; Bay Plaza Apple, LLC; Bay Terrace Apple, LLC; Bed-Stuy Apple, LLC; Broadway apple, LLC; BTM Apple, LLC; Cortlandt Apple, LLC; Cross Country Apple, LLC; Crossroads Apple, LLC; EB Apple, LLC; Expressway Apple, LLC; Flatbush Apple, LLC; Fordham Apple, LLC; Fresh Meadows Apple, LLC; Harlem Apple, LLC; Hawthorne Apple, LLC; JAMAICA APPLE, LLC; Kisco Apple, LLC; Mamaroneck Apple, LLC; New Dorp Apple, L.L.C.; New Rochelle Apple, LLC; Outerbridge Apple, LLC; Port Chester Apple, LLC; Queens center apple, LLC; Rego Park Apple, LLC; Riverdale Apple, LLC; S.I. Mall Apple, LLC; Sheepshead apple, LLC; SVC Apple, LLC; Triangle Apple, LLC; White Plains Apple, LLC; ZANE TANKEL, an individual; ROY RAEBURN, an individual; AUBREY DALY, an individual; ROLAND RAYMOND, an individual; DERRICK PALMER, an individual; Susy Quintero, an individual; and CHRIS ANTOINE, listed below:

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Attorneys for Defendants

Dated: October 4, 2013

By: /s/ Daniela Nanau
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